

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et al.,**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION FOR EXTENSION OF TIME TO FILE THE ITS ACTION PLAN
IN COMPLIANCE WITH ORDER AT DOCKET NO. 1175**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Bureau (“Defendants” and/or “PRPB”), by and through the undersigned counsel, and respectfully state and pray as follows:

1. On April 1, 2019, PRPB, Plaintiff United States of America (“USDOJ”), and former Federal Monitor, Arnaldo Claudio, (jointly, where appropriate, the “Parties”) filed a *Joint Motion in Compliance with Order* informing the Court of the status of PRPB’s information technology projects and electronic systems (“ITS”). *See* Docket No. 1172.
2. Therein, the Parties requested thirty (30) days to develop an effective plan of action, which would provide a detailed outline of the tasks PRPB must undertake to accomplish its ITS-related goals and a breakdown of those tasks into actionable steps based on current ITS-related deadlines.
3. The Court noted the Parties’ submission and approved the Parties’ proposed thirty (30) day period to file the plan of action. *See* Docket No. 1175.

4. On May 2, 2019, the PRPB requested an additional thirty (30) day period to finalize the proposed action plan, discuss it with the Parties, and file it with the Court in compliance with the Court's Order at Docket No. 1175. *See* Docket No. 1210. The Court granted PRPB's motion for extension of time as requested. Docket No. 1211.
5. The PRPB has made significant progress in preparing its effective plan of action. However, following the Court's authorization of the requested extension of time, former Federal Monitor Arnaldo Claudio resigned, which hampered the Parties ability to sustain meaningful discussions on this matter prior to the PRPB filing its action plan with the Court.
6. The Parties are scheduled to meet with the new monitoring team during the week of June 10, 2019. As such, the PRPB hereby requests an additional thirty (30) day extension to allow the Parties to meet with the new monitoring team to discuss and finalize the effective plan of action.
7. The PRPB discussed the instant petition with counsel for the USDOJ and with Acting Federal Monitor John Romero, both of whom expressed no objection to PRPB's request for additional time.
8. This request is made in good faith and is not meant to delay these proceedings.

WHEREFORE, Defendants respectfully request that the Court GRANT the above and afford the PRPB a thirty (30) day extension of time to submit the ITS action plan, with any additional relief it deems just and proper.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 2nd day of June 2019.

By:

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